

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CIVIL ACTION No. 1:11-CV-129**

JIHUI ZHANG,

Plaintiff,

v.

**FEDERATION OF STATE
MEDICAL BOARDS, NATIONAL
BOARD OF MEDICAL
EXAMINERS, and PROMETRIC,**

Defendants.

MOTION FOR EXTENSION OF TIME

COMES NOW Defendant Prometric Inc. (“Defendant”) through counsel, by and through counsel, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Rules 6.1, 7.3 and 77.2, and respectfully request an extension of time of thirty (30) days, up to and including April 17, 2011, in which to answer or otherwise respond to the Complaint filed by Plaintiff Jihui Zhang.

In support of this motion, Defendant shows the Court as follows:

1. Plaintiff served its Complaint on Defendant on February 25, 2011, making March 18, 2011 the date on which Defendant must answer or otherwise respond.
2. Defendant has a good faith basis for requesting such extension of time, in that Defendant only recently retained counsel and require additional time to investigate and adequately respond to the allegations of Plaintiff’s Complaint.

3. On March 15, 2011, Defendant's counsel contacted Plaintiff, who declined to authorize his consent for this requested extension.

WHEREFORE, Defendant respectfully requests that, for good cause shown, the time within which Defendant must answer or otherwise respond to the Complaint be extended up to and including April 17, 2011.

Respectfully submitted this 15th day of March, 2011.

/s/ Benjamin R. Norman
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

None

In addition, I hereby certify that the foregoing was served upon the other parties of this action by first-class mail, postage prepaid, addressed to the following:

Jihui Zhang
102 Rowe Road
Chapel Hill, North Carolina 27516

Federation of State Medical Boards
400 Fuller Wiser Road, Suite 300
Euless, Texas 76039

National Board of Medical Examiners
3750 Market Street
Philadelphia, PA 19104-3102

This the 15th day of March, 2011.

/s/ Benjamin R. Norman
Benjamin R. Norman